Dale Seifker
Home Products International, Inc.
885 N. Chestnut Street
Seymour, IN 47274-1246

Re: 071-14031-00036
Minor Permit Modification to
Part 70 Permit 071-5478-00036

Dear Mr. Seifker:

Home Products International, Inc. was issued a Part 70 operation permit on February 19, 1999 for an ironing board manufacturing plant located at 201 S. Jackson Park Drive, Seymour, IN 47274-1874. An application to modify the source was received on February 2, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described below:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

East Plant:

(1) One (1) surface coating booth used for touch-up painting, identified as EPB3, equipped with electrostatic disc spray equipment, with a maximum capacity of five hundred seventy (570) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-4. (Constructed in 1979)

(2) One (1) paint line consisting of:

(a) One (1) surface coating booth, identified as EPB1, equipped with electrostatic disc spray equipment, with a maximum capacity of five hundred seventy (570) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-2. (Constructed in 1971)

(b) One (1) surface coating booth, identified as EPB2, equipped with electrostatic disc spray equipment, with a maximum capacity of five hundred seventy (570) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-3. (Constructed in 1971)

(3) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.

(4) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.

West Plant:

(1) One (1) paint line consisting of:

(a) One (1) surface coating booth, identified as WPB1, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-12. (Constructed in 1969)

(b) One (1) surface coating booth, identified as WPB2, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-14. (Constructed in 1969)

(2) One (1) paint line consisting of:

(a) One (1) surface coating booth, identified as WPB3, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-19A. (Constructed in 1969)

(b) One (1) surface coating booth, identified as WPB4, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-19B. (Constructed in 1969)

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated,~~ as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(a) One (1) 5 million Btu per hour natural gas fired boiler, identified as EBA. (Constructed in 1989)

(b) One (1) 0.23 million Btu per hour natural gas fired boiler, identified as WBA. (Constructed in 1991)

(c) One (1) 2.2 million Btu per hour natural gas fired boiler, identified as WBB. (Constructed in 1991)

(d) One (1) 3.2 million Btu per hour natural gas fired boiler, identified as WBC. (Constructed in 1984)

(e) One (1) 0.8 MMBtu/hr natural gas fired burn-off oven.

(f) One (1) 2.0 MMBtu/hr natural gas fired curing oven.

(g) One (1) 3.0 MMBtu/hr natural gas fired drying oven.

Furthermore, Section D.3 is hereby incorporated into the permit, to read as follows:

Facility Description [326 IAC 2-7-5(15)]

(1) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.

(2) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.

(3) one (1) 0.8 MMBtu/hr natural gas fired burn-off oven.

(4) one (1) 2.0 MMBtu/hr natural gas fired curing oven.

(5) one (1) 3.0 MMBtu/hr natural gas fired drying oven.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from powder coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

For a process weight rate of 2.55 tons per hour, this equation provides an emission limit of 7.68 pounds per hour.

D.3.2 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the burn-off oven shall:

(1) consist of primary and secondary chambers or the equivalent;
(2) be equipped with a primary burner;
(3) comply with 326 IAC 5-1 and 326 IAC 2;
(4) be maintained properly as specified by the manufacturer;
(5) be operated according to the manufacturer's recommendations;
(6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
(7) be operated so that emissions of hazardous material or noxious odors are prevented;
(8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
(9) not create a nuisance or a fire hazard.

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Record Keeping Requirements

There are no specific record keeping requirements for this facility.

D.3.5 Reporting Requirements

There are no specific reporting requirements for this facility.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ARD

cc: File - Jackson County
U.S. EPA, Region V
Jackson County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Melinda Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Home Products International, Inc.
201 Jackson Street (East Plant), Plant ID 071-00001
104 West 9th Street (West Plant), Plant ID 071-00003
400 South Airport Road (Distribution Center), Plant ID 071-00026
Seymour, Indiana 47274

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T071-5478-00036	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 19, 1999

First Minor Permit Modification 071-14031-00036	Pages Amended: 2-5, 30-31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 1, 2001

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an ironing board manufacturing operation.

Responsible Official:	Joe Deppen
Source Address:	201 Jackson Street, Seymour, Indiana 47274 (East Plant) 104 West 9th Street, Seymour, Indiana 47274 (West Plant) 400 South Airport Road, Seymour, Indiana 47274 (Distribution Center)
Mailing Address:	885 North Chestnut Street, P.O. Box 408, Seymour, Indiana 47274
SIC Code:	3499
County Location:	Seymour
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

East Plant:

(1) One (1) surface coating booth used for touch-up painting, identified as EPB3, equipped with electrostatic disc spray equipment, with a maximum capacity of five hundred seventy (570) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-4. (Constructed in 1979)

(2) One (1) paint line consisting of:

(a) One (1) surface coating booth, identified as EPB1, equipped with electrostatic disc spray equipment, with a maximum capacity of five hundred seventy (570) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-2. (Constructed in 1971)

(b) One (1) surface coating booth, identified as EPB2, equipped with electrostatic disc spray equipment, with a maximum capacity of five hundred seventy (570) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-3. (Constructed in 1971)

(3) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.

(4) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.

West Plant:

(1) One (1) paint line consisting of:

(a) One (1) surface coating booth, identified as WPB1, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-12. (Constructed in 1969)

(b) One (1) surface coating booth, identified as WPB2, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-14. (Constructed in 1969)

(2) One (1) paint line consisting of:

(a) One (1) surface coating booth, identified as WPB3, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-19A. (Constructed in 1969)

(b) One (1) surface coating booth, identified as WPB4, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-19B. (Constructed in 1969)

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(a) One (1) 5 million Btu per hour natural gas fired boiler, identified as EBA. (Constructed in 1989)

(b) One (1) 0.23 million Btu per hour natural gas fired boiler, identified as WBA. (Constructed in 1991)

(c) One (1) 2.2 million Btu per hour natural gas fired boiler, identified as WBB. (Constructed in 1991)

(d) One (1) 3.2 million Btu per hour natural gas fired boiler, identified as WBC. (Constructed in 1984)

(e) One (1) 0.8 MMBtu/hr natural gas fired burn-off oven.

(f) One (1) 2.0 MMBtu/hr natural gas fired curing oven.

(g) One (1) 3.0 MMBtu/hr natural gas fired drying oven.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.

(2) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.

(3) one (1) 0.8 MMBtu/hr natural gas fired burn-off oven.

(4) one (1) 2.0 MMBtu/hr natural gas fired curing oven.

(5) one (1) 3.0 MMBtu/hr natural gas fired drying oven.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from powder coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

For a process weight rate of 2.55 tons per hour, this equation provides an emission limit of 7.68 pounds per hour.

D.3.2 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the burn-off oven shall:

(1) consist of primary and secondary chambers or the equivalent;
(2) be equipped with a primary burner;
(3) comply with 326 IAC 5-1 and 326 IAC 2;
(4) be maintained properly as specified by the manufacturer;
(5) be operated according to the manufacturer's recommendations;
(6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
(7) be operated so that emissions of hazardous material or noxious odors are prevented;
(8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
(9) not create a nuisance or a fire hazard.

Compliance Determination Requirement

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

There are no specific record keeping requirements for this facility.

D.3.5 Reporting Requirements

There are no specific reporting requirements for this facility.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Home Products International, Inc.** (f.k.a Seymour Housewares, Inc.)
Source Location:	**201 S. Jackson Park Drive, Seymour, IN 47274-1874**
County:	**Jackson**
SIC Code:	**3499**
Operation Permit No.:	**071-5478-00036**
Operation Permit Issuance Date:	**February 19, 1999**
Revision No.:	**071-14031-00036**
Permit Reviewer:	**Allen R. Davidson**

On February 2, 2001, the Office of Air Quality (OAQ) received an application from Home Products International, Inc. relating to the construction and operation of the following equipment:

(1) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.

(2) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.

(3) one (1) 0.8 MMBtu/hr natural gas fired burn-off oven.

(4) one (1) 2.0 MMBtu/hr natural gas fired curing oven.

(5) one (1) 3.0 MMBtu/hr natural gas fired drying oven.

History

Seymour Housewares, Inc. was issued a Part 70 permit for an ironing board manufacturing plant on February 19, 1999. A minor source modification (071-13876-00036) is being approved for this application in March, 2001. The minor source modification must be incorporated into the Part 70 permit.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Recommendation

The staff recommends to the Commissioner that the revision be approved as a Minor Permit Modification. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 2, 2001.

Emission Calculations

See Appendix A of Minor Source Modification 071-13876-00036 for detailed emissions calculations. (3 pages)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulate, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Single	less than 10
TOTAL	greater than 25

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of criteria pollutants are equal to or greater than 100 tons per year. Also, the potential to emit a combination of HAP is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

This existing source is a major source for Prevention of Significant Deterioration, 326 IAC 2-2. Volatile organic compounds have the potential to emit at a rate of 250 tons per year or more.

The revision's potential to emit is follows:

Pollutant	Potential To Emit (tons/year)	PSD Significant Level (tons/yr)
PM		25
PM-10		15
SO_2		40
VOC		40
CO		100
NO_x		40

HAP	Potential To Emit (tons/year)	PSD Significant Level (tons/yr)
TOTAL		n/a

This application was issued a minor source modification pursuant to 326 IAC 2-7-10.5. Because the minor source modification was not processed under 326 IAC 2-7-17 or 326 IAC 2-7-18, the Part 70 permit cannot be revised by an administrative amendment under 326 IAC 2-7-11. A minor permit modification must be issued pursuant to 326 IAC 2-7-12.

This revision is not a major modification for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 because the increase in potential to emit every attainment pollutant is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson County has been designated as attainment or unclassifiable for ozone.

Jackson County has also been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) (40 CFR Part 60) applicable to this source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63) applicable to this source. This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T, since no halogenated solvents are used.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Rules)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source. This source is an existing major source that was constructed before 1969, which is before the August 7, 1977 applicability date of the PSD rules.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOCs and PM. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source was constructed and commenced operation before 1969, which is before the applicability timeframe of the rule, October 7, 1974 and prior to January 1, 1980, therefore, 326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable.

State Rule Applicability - Electrostatic Powder Coating Operation

326 IAC 6-3-2 (Particulate Emissions Limitations)

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

For a process weight rate of 2.55 tons per hour, this equation provides an emission limit of 7.68 pounds per hour.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This emission unit is not subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-1 (Applicability), the rule is not applicable since there are no volatile organic compound (VOC) emissions.

State Rule Applicability - Iron Phosphate Cleaning System

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This facility is not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations) because it does not utilize organic solvents.

State Rule Applicability - Burn-Off Oven

326 IAC 4-2-2 (Incinerators)

This facility is subject to 326 IAC 4-2. Pursuant to 326 IAC 4-2-2 (Incinerators), for incinerators with a maximum burning capacity less than 200 pounds per hour, particulate matter emissions shall not exceed 0.5 pounds per 1000 pounds of dry exhaust gas at standard conditions, corrected to 50% excess air.

State Rule Applicability - Curing and Drying Ovens

There are no state rules applicable to these facilities.

Conclusion

The operation of these facilities shall be subject to the conditions of the attached Minor Permit Modification, No 071-14031-00036.